

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JOUSHTON RODRIGUEZ,
SOLOMON RODRIGUEZ,
STEVEN WONG, and
MOHAMMED ZEIDAN,

Defendants.

CR. NO. 3:24-CR-139

(Judge *Mariani*)

FILED
SCRANTON

MAY 28 2024

PER

AW
DEPUTY CLERK

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 1951

(Conspiracy to Interfere with Commerce by Robbery)

Beginning on or about July 22, 2020, and continuing through on or about September 2020, in Schuylkill County, within the Middle District of Pennsylvania and elsewhere, the defendants,

JOUSHTON RODRIGUEZ,
SOLOMON RODRIGUEZ,
STEVEN WONG, and
MOHAMMED ZEIDAN,

knowingly and intentionally conspired and agreed with others known and unknown to the grand jury to commit robberies, which robberies unlawfully obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, in that defendants conspired to unlawfully take and obtain property from other persons by entering their home with firearms and stealing controlled substances and U.S. currency, in their presence, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property.

All in violation of Title 18, United States Code, Section 1951(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 1951

(Attempted Interference with Commerce by Robbery)

On or about August 29, 2020, in Schuylkill County, within the Middle District of Pennsylvania, the defendants,

JOUSHTON RODRIGUEZ,
SOLOMON RODRIGUEZ,
STEVEN WONG, and
MOHAMMED ZEIDAN

did knowingly, intentionally and unlawfully attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully attempt to take and obtain property consisting of cash and controlled substances from individuals in Schuylkill Haven, Pennsylvania, in their presence, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, that is, the defendants displayed firearms and threatened violence, and did aid and abet the same.

All in violation of Title 18, United States Code, Sections 1951 and 2 and *Pinkerton v. United States*, 328 U.S. 640 (1946).

THE GRAND JURY FURTHER CHARGES:

COUNT 3

18 U.S.C. § 1951

(Interference with Commerce by Robbery)

On or about August 30, 2020, in Schuylkill County, within the Middle District of Pennsylvania, the defendants,

**JOUSHTON RODRIGUEZ,
SOLOMON RODRIGUEZ, and
STEVEN WONG**

did knowingly, intentionally and unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain property consisting of cash and controlled substances from individuals in Mahanoy City, Pennsylvania, in their presence, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons, that is, the defendants displayed firearms and threatened violence, and did aid and abet the same.

All in violation of Title 18, United States Code, Sections 1951 and 2 and *Pinkerton v. United States*, 328 U.S. 640 (1946).

THE GRAND JURY FURTHER CHARGES:

COUNT 4
18 U.S.C. § 924(c)(1)(A)
(Use of Firearm in
Furtherance of a Crime of Violence)

On or about August 30, 2020, in Schuylkill County, within the Middle District of Pennsylvania, the defendants,

**JOUSHTON RODRIGUEZ,
SOLOMON RODRIGUEZ, and
STEVEN WONG**

did knowingly brandish, carry, and use firearms, including a machinegun, during and in relation to, and possess firearms in furtherance of, a crime of violence for which each may be prosecuted in a court of the United States, that is, the crime of interference with commerce by robbery in violation of Title 18, United States Code, Section 1951 as alleged in Count 3 of this Indictment and did aid and abet the same.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and 2 and *Pinkerton v. United States*, 328 U.S. 640 (1946).

THE GRAND JURY FURTHER CHARGES:

COUNT 5

18 U.S.C. § 924(c)(1)(A)
(Use of Firearm in
Furtherance of a Crime of Violence)

On or about September 14, 2020, in Schuylkill County, within the
Middle District of Pennsylvania, and elsewhere, the defendants,

JOUSHTON RODRIGUEZ,
SOLOMON RODRIGUEZ, and
STEVEN WONG

did knowingly brandish, carry, and use firearms, including a
machinegun, during and in relation to, and possess firearms in
furtherance of, a crime of violence for which each may be prosecuted in
a court of the United States, that is, the crime of interference with
commerce by robbery in violation of Title 18, United States Code,
Section 1951 and did aid and abet the same.

All in violation of Title 18, United States Code, Sections
924(c)(1)(A), (B)(ii) and 2 and *Pinkerton v. United States*, 328 U.S. 640
(1946).

THE GRAND JURY FURTHER CHARGES:

COUNT 6
18 U.S.C. § 924(o)
(Firearms Conspiracy)

From on or about July 1, 2020, and continuing to on or about January 8, 2021, in Schuylkill County, in the Middle District of Pennsylvania, and elsewhere, the defendants,


**JOUSHTON RODRIGUEZ,
SOLOMON RODRIGUEZ,
STEVEN WONG, and
MOHAMMED ZEIDAN,**

did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to knowingly and intentionally brandish, carry, and use firearms during and in relation to, and possess firearms in furtherance of, crimes of violence, that is the interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951, for which they may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Section 924(c).

All in violation of Title 18, United States Code, Section 924(o).

A TRUE BILL

GERARD M. KARAM
United States Attorney



JAMES M. BUCHANAN
Assistant United States Attorney

5-28-2024

Date